



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2BE-TTM----
Our file - Notre référence
GCDOCS#103498156

June 6, 2022

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of Water Licence Application 2BE-TTM---- for Bathurst Metals Corporation's TTMG Project in the Kitikmeot Region of Nunavut

Dear Mr. Dwyer,

Thank you for the May 13, 2022 invitation to review the referenced new water licence application, submitted by Bathurst Metals Corporation for its TTMG Project in the Kitikmeot Region of Nunavut.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at david.zhong@rcaanc-cirnac.gc.ca or Andrew Keim at andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

David Zhong,
Regulatory & Science Advisor



Technical Review Memorandum

Date: June 6, 2022

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: David Zhong, Regulatory & Science Advisor, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of
Water Licence Application 2BE-TTM---- for Bathurst Metals
Corporation's TTMG Project in the Kitikmeot Region of Nunavut

Region: Kitikmeot

A. BACKGROUND

The TTMG Project (the Project), owned and operated by Bathurst Metals Corporation (BMV), is located approximately 180 km south of Cambridge Bay and 60 km north northwest of Bathurst Inlet in the West Kitikmeot Region of Nunavut. The TTMG Project comprises four(4) mineral claims, includes the Turner Lake, TED, McAvoy Lake, and Gela Lake claims on Inuit Owned Land. The Project lies within two drainage basins, one drains into the Hood River and the other the James River. Both rivers drain east into Bathurst Inlet. The general geographical coordinates of the extents of the Project are: NW: 67°25'19.2"N - 109°30'28.8"W, NE: 67°28'8.4"N -108°57'25.2"W, SE: 67°07'48"N -108°45'18"W, and SW: 67°04'48"N -109°18'28.8"W.

On March 21, 2022, BMV submitted to the Nunavut Water Board (NWB) a new water licence application for a proposed 5000m Diamond Drilling Program. Based on documents submitted by BMV in the water licence application, the drilling program will focus on known gold occurrences located on the Turner Lake and Ted properties or claims during the summer months, from July to September. Bathurst Inlet Lodge, located at 66°50'24"N - 108°1'58.8"W, owned and operated by Kingaunmiut Ltd., will be used as base camp for the drilling program. Up to nine (9) drilling program personnel will be accommodated and catered at Bathurst Inlet Lodge and transported daily to the various drilling sites on the Turner Lake and Ted properties from the Lodge by helicopter. No field camp will be required. Equipment, fuel and materials required for the drilling program, with the exception of drilling water, will be transported to the drilling sites from the Lodge and between drilling sites by helicopter. The drilling program will use one diesel powered diamond drill. Other equipment used at the drill may include a portable gas powered generator and a gas powered water pump. A maximum of 30 cubic meter per day drilling water will be obtained from surface water near the drilling sites. Waste generated from project activities will be disposed off either at the drilling sites or at the Bathurst Inlet Lodge or at waste facilities in Yellowknife. A temporary 10' x 16' canvas prospectors' tent will be constructed on the Turner property for core storage.



CIRNAC provides the following comments and recommendations pertaining to the application. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Scope of water licence application
R-02	Management plans
R-03	Quantify water usage for drilling
R-04	Drilling additives

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Water Licence Application-TTMG Project	Greg Bronson, Bathurst Metals Corp., 2022-03-18
TTMGDrillProjectSummaryWiTranslation	Bathurst Metals Corp., 2022
TTMG Project Description2022	Bathurst Metals Corp., 2022
TTMG Project_MapOfProperties	S. Bronson, 2021
NWB-TTMG Project-SIG	Bathurst Metals Corp., 2022
BMV Certificate of Incorporation in BC	Ron Townshend, Registrar of Companies, BC, 2006-01-24
Certificate of Name Change	Carol Prest, Registrar of Companies, BC, 2020-08-12
Bathurst Metals Corp FS 2022-Q2-V2	Bathurst Metals Corp., 2022
BMV Certificate of Registration of Extra-Territorial Corp in NU	Tracy Doyle, Registrar of Corporations, Nunavut, 2015-03-17



C. RESULTS OF REVIEW

1. Scope of Water Licence Application

Comment:

The water license applicant indicated in the application that Bathurst Inlet Lodge, owned and operated by Kingaunmiut Ltd., will be used as base camp to accommodate and cater up to nine (9) project personnel, to store diesel fuel (volume: 50 x 205 L), Jet-B helicopter fuel (volume: 60 x 205 L), gasoline (volume: 5 x 205 L), and propane (volume: 10 x 100 L) for the project, and to dispose solid waste (e.g., bags, pails, containers, etc.) produced from drilling activities at the project drilling sites. The applicant also indicated that a temporary tent will be constructed for core storage on the Turner property.

CIRNAC notes that project activities such as the water usage, fuel storage and handling, and waste disposal at Bathurst Inlet Lodge and the construction of the tent for drilling core storage on the Turner property are not part of this water licence application. It is not clear if these project activities are permitted or covered under any valid water licence.

Recommendation:

(R-01) CIRNAC recommends that the applicant make sure all project activities that may involve water usage be within the scope of this water licence application or permitted under another valid water licence.

2. Management Plans

Comment:

The proposed project activities include surface water usage and waste disposal (i.e., withdrawing surface water for drilling, depositing drilling sludge, sewage, solid waste, hazardous waste, etc.) and fuel handling (i.e., fuel storage, transportation, transfer and consumption, etc.) at various locations on the Turner Lake and TED properties and at Bathurst Inlet Lodge.

CIRNAC notes that no plan for water and waste management, fuel management, spill prevention and response, and site abandonment and reclamation is included in this water licence application for review.

Recommendation:

(R-02) CIRNAC recommends that at a minimum, a fuel management plan, a spill prevention and response plan, a waste management plan, and an abandonment and reclamation plan be provided by the applicant for the review of this water licence application.



3. Quantify Water Usage for Drilling

Comment:

The applicant requested a maximum 30 cubic meter per day of water usage for drilling activities. It is not clear how the actual daily water usage for drilling activities would be measured and the limit on the quantity of daily water usage be respected.

Recommendation:

(R-03) CIRNAC recommends that the licensee clarify how the quantity of water usage for drilling will be measured or estimated and the daily limit respected.

4. Drilling Additives

Comment:

The applicant stated that “(A)ll drilling additives used in the drilling process will be environmentally friendly and safe for the local environment.” However, no information on the drilling additives is provided and no evidence or discussion is given to justify or substantiate this statement or conclusion.

Recommendation:

(R-04) CIRNAC recommends that the applicant provide the details to substantiate the statement that all drilling additives used in the drilling process will be environmentally friendly and safe for the local environment.